IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

R'KES STARLING, individually and on	§	
behalf of all others similarly situated	§	
	§	
Plaintiff,	§	
	§	
V.	§	Civil Action No. 1:24-cv-000991-DII
	§	
PR ADVISORS, LLC D/B/A PINNACLE	§	
REALTY ADVISORS and	§	
RAM PROPERTIES, LLC	§	
	§	
Defendants.	§	

SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT

Defendant RAM Properties, LLC ("RAM") moves to extend the time within which it may answer, move, or otherwise respond to Plaintiff's Complaint.

On August 26, 2024, Plaintiff filed his Complaint. [Dkt. 1]. RAM was served on September 9, 2024, making Defendant's current deadline to answer or otherwise respond to the Complaint September 27, 2024. On October 2, 2024, the Court granted RAM's request to extend RAM's deadline to November 12, 2024. On November 7, 2024, Defendant PR Advisors, LLC ("PR Advisors") requested that their answer deadline be extended to November 26, 2024. [Dkt. 9] RAM respectfully request that its deadline be extended up through and including November 26, 2024 to align with the other defendant in this case.

Dated: November 7, 2024 Respectfully submitted,

By: /s/ Yusuf A. Bajwa
Yusuf A. Bajwa
Texas Bar No. 24047754
Lad Z. Stricker
Texas Bar No. 24110876
SANDERS BAJWA LLP
919 Congress Avenue, Suite 1305
Austin, Texas 78701
[Tel.] (512) 535-2440
ybajwa@sandersbajwa.com
lstricker@sandersbajwa.com

Attorneys for Defendant RAM Properties, LLC

CERTIFICATE OF CONFERENCE

I certify that the undersigned counsel conferred with the Plaintiff's counsel, Andrew Perrong, regarding the relief requested in this motion on November 7, 2024, and Mr. Perrong is unopposed to the motion.

<u>/s/ Yusuf A. Bajwa</u> Yusuf A. Bajwa

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was served this 7th day of November 2024 to all parties via PACER.

Andrew Roman Perrong a@perronglaw.com PERRONG LAW, LLC 2657 Mount Carmel Ave. Glenside, PA 19038

Attorneys for Plaintiff

C. Brenton Kugler brent.kugler@solidcounsel.com SCHEEF & STONE, L.L.P. 500 North Akard, Suite 2700 Dallas, Texas 75201

Leoncio A. Gil, III leon.gil@solidcounsel.com SCHEEF & STONE, L.L.P. 2600 Network Blvd., Suite 400 Frisco, Texas 75034

John W. McGuinness
jmcguinness@manatt.com
(Pro Hac Vice to be requested)
A. Paul Heeringa
pheeringa@manatt.com
(Pro Hac Vice to be requested)
MANATT, PHELPS & PHILLIPS, LLP
1050 Connecticut Avenue, NW, Suite 600
Washington, D.C. 20036

Attorneys for Defendant PR Advisors, LLC

/s/ Yusuf A. Bajwa Yusuf A. Bajwa